

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

| | | |
|----------------------------------|---|--------------------------|
| ERIC NOBLE, | : | Case No. 1:20-cv-00594 |
| | : | |
| Plaintiff, | : | Judge Michael R. Barrett |
| | : | |
| v. | : | |
| | : | |
| THE PUBLIC LIBRARY OF CINCINNATI | : | AFFIDAVIT OF |
| AND HAMILTON COUNTY, et al., | : | PAULA BREHM-HEEGER |
| | : | |
| Defendants. | : | |

STATE OF OHIO :
: SS:
COUNTY OF HAMILTON :

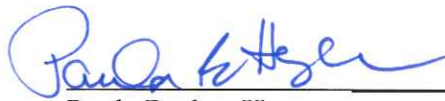
Comes now the affiant, Paula Brehm-Heeger, being first duly cautioned and sworn, and hereby states the following:

1. I am the Executive Director of Defendant, The Public Library of Cincinnati and Hamilton County.
2. Listed as Defendants in Plaintiff Eric Noble's First Amended Complaint are the Board of Trustees of the Cincinnati and Hamilton County Public Library, along with Board Members Monica Donath Kohn, Elizabeth H. LaMacchia, Karen R. Clemons, Nadine L. Allen, Robert G. Hendon, Gregory W. Olson, and Diane Cunningham Redden.
3. I made the decision to terminate Mr. Noble as Executive Director. While I discussed Mr. Noble's termination with Library employees Michelle Matthews, Wei Liu, and Kyla Hardin, it was my ultimate decision as Executive Director to terminate Mr. Noble. At no time did I discuss Mr. Noble's termination with the Board of Trustees of the Cincinnati and Hamilton County Public Library, nor any individual member(s) of the Board of

but not limited to those persons named as Board of Trustees members in Mr. Noble's Complaint.

4. At no time did I ask the opinion of the Board of Trustees regarding Mr. Noble's termination, nor did the Board of Trustees have any input in Mr. Noble's termination.

FURTHER AFFIANT SAYETH NAUGHT.




Paula Brehm-Heeger

Sworn to and subscribed in my presence by Paula Brehm-Heeger, on this 1st day of December 2021.



ELAINE FAY
Notary Public, State of Ohio
My Commission Expires:
April 18, 2026


Notary Public
Commission Expires 4/18/2026